

AB:ALK

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

JUSTIN DAUGHTRY,

Defendant.

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AFFIDAVIT AND  
COMPLAINT IN SUPPORT  
OF AN APPLICATION FOR  
AN ARREST WARRANT

(18 U.S.C. § 1709)

20 MJ 409

EASTERN DISTRICT OF NEW YORK, SS:

KYLE KNIESTE, being duly sworn, deposes and states that he is a Special Agent with the United States Postal Service, Office of Inspector General, duly appointed according to law and acting as such.

On or about April 17, 2020, within the Eastern District of New York and elsewhere, the defendant JUSTIN DAUGHTRY, being an employee of the United States Postal Service (“USPS”) did knowingly and intentionally steal, abstract and remove mail and any article or thing contained therein entrusted to him and which came into his possession intended to be conveyed by mail and carried and delivered by any carrier, messenger, agent or other person employed by USPS.

(Title 18, United States Code, Section 1709)

The source of your deponent’s information and the grounds for his belief are as follows:<sup>1</sup>

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary

1. I am a Special Agent with the United States Postal Service, Office of Inspector General (“USPS-OIG”) and have been involved in the investigation of numerous cases involving mail theft. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file and from reports of other law enforcement officers involved in the investigation.

2. In or about March 2020, USPS-OIG received information from multiple USPS employees indicating that a USPS carrier technician, JUSTIN DAUGHTRY, had been opening mail parcels. USPS-OIG accordingly installed an electronic surveillance device inside the Postal Service Long Life Vehicle (“LLV”) used by DAUGHTRY to deliver mail parcels.

3. As reflected in surveillance video, from approximately March 2020 through April 17, 2020, DAUGHTRY opened numerous mail parcels, inspected their contents, and resealed them without taking those contents.

4. On or about April 17, 2020, at approximately 12:53 p.m., DAUGHTRY opened a large brown cardboard parcel (“the Subject Parcel”) and removed two large cans with no labels or markings on them. DAUGHTRY then re-sealed the Subject Parcel with priority mail tape, removed the shipping label, and placed the shipping label inside an energy drink can.

5. At approximately 1:22 p.m., DAUGHTRY exited the LLV and returned with a red-handled can opener. DAUGHTRY attempted to open one of the large, unmarked cans that he had removed from the Subject Parcel but was unsuccessful.

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to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

6. At approximately 1:40 p.m., DAUGHTRY threw the Subject Parcel out of the moving LLV and continued to drive.

7. At approximately 1:43 p.m., DAUGHTRY smelled one of the large, unmarked cans that he removed from the Subject Parcel.

8. At approximately 1:44 p.m., DAUGHTRY placed one of the large unmarked cans into a black plastic bag and then into a USPS mail tub. DAUGHTRY then placed the other large, unmarked can into the mail tub as well.

9. At approximately 5:06 p.m., DAUGHTRY removed both cans and the can opener from the mail tub and placed them into his USPS mail satchel.

10. At approximately 5:14 p.m., DAUGHTRY threw the energy drink can out of the moving LLV.

11. At approximately 5:25 p.m., DAUGHTRY arrived at the USPS Archer Avenue Station parking lot and exited the LLV with his USPS mail satchel. Approximately three minutes later, a black sedan with a broken driver side mirror drove by the LLV. My investigation to date has revealed that DAUGHTRY drives a black Honda sedan with a broken driver side mirror and that a black 2019 Honda Accord is registered to DAUGHTRY.

12. At approximately 5:27 p.m., DAUGHTRY returned to the LLV without his USPS mail satchel. DAUGHTRY then parked the LLV and departed the LLV for the night.

13. Because public filing of this document could result in a risk of flight by the defendant, your deponent respectfully requests that this complaint, as well as any arrest warrant issued in connection with this complaint, be filed under seal.

WHEREFORE, your deponent respectfully requests an arrest warrant for the defendant JUSTIN DAUGHTRY, so that he may be dealt with according to law.



KYLE KNIESTE  
Special Agent, United States Postal Service,  
Office of Inspector General

Sworn to before me by telephone this  
3rd day of June, 2020



THE HONORABLE STEVEN M. GOLD  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK